

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

**CALEB BARNETT, et al.,** )  
                                  )  
                                  )  
**Plaintiffs,**               )  
                                  )  
                                  )  
**vs.**                          )      **Case No. 3:23-cv-209-SPM**  
                                  )  
                                  )  
**KWAME RAOUL, et al.,**     )  
                                  )  
                                  )  
**Defendants.**               )

---

**DANE HARREL, et al.,**     )  
                                  )  
                                  )  
**Plaintiffs,**               )  
                                  )  
                                  )  
**vs.**                          )      **Case No. 3:23-cv-141-SPM**  
                                  )  
                                  )  
**KWAME RAOUL, et al.,**     )  
                                  )  
                                  )  
**Defendants.**               )

---

**JEREMY W. LANGLEY, et al.,** )  
                                  )  
                                  )  
**Plaintiffs,**               )  
                                  )  
                                  )  
**vs.**                          )      **Case No. 3:23-cv-192-SPM**  
                                  )  
                                  )  
**BRENDAN KELLY, et al.,**    )  
                                  )  
                                  )  
**Defendants.**               )

---

**MOTION FOR COSTS AND ATTORNEY FEES, PURSUANT TO 42 USC 1988**

**BY LANGLEY PLAINTIFFS**

Comes now Plaintiffs Jeremy W. Langley, et al, by and through their attorneys, Thomas G. Maag and the Maag Law Firm, LLC, and pursuant to 42 USC 1988, moves this Honorable court for costs of suit, litigation costs, and attorney fees, and in support, states as follows:

1. That this action was brought by these plaintiff's pursuant to 42 USC 1983.
2. That pursuant to 42 USC 1988, this Court has the authority and power to award a prevailing Plaintiff its/their costs, including litigation costs and attorney fees.
3. That based on this Court's judgment, entered this date, it is clear that Plaintiffs are the prevailing parties, and thus, entitled to fees and costs under 42 USC 1988.
4. That, it appears, that under 7<sup>th</sup> Circuit precedent, that this fee motion will not delay any appeal that Defendants wish to make, and Plaintiff's expect that Defendants will file a Notice of Appeal, if they have not done so by the time of filing this motion, quickly.
5. That it is conceivable that this Court would wish to hear the issue of costs and fees post any appeal, as it is conceivable that it would wish to consider the issue at this time. Plaintiffs have no preference, but do not wish to waive the issue.
6. To that end, the Langley Plaintiff's move this Honorable Court for costs and fees, pursuant to 42 USC 1988, and request leave to file a petition setting forth the specific costs and fees being sought, along with supporting documentation. The Langley Plaintiff's have no preference as to whether this should be done pre or post appeal, but should this Honorable Court see fit to award costs and fees, that this Court grant the Langley Plaintiffs at least 21 days from this date to file supporting documentation setting forth their specific claimed fees and costs.

WHEREFORE, the Langley Plaintiffs move for fees and costs, as the prevailing Plaintiff, and seek an order allowing them at least 21 days to file the supporting documentation for their claimed fees, and such other further and different relief as the Court deems appropriate.

Dated: 11-8-2024

Respectfully Submitted,

Jeremy Langley, et al

By:s/Thomas G. Maag

Thomas G. Maag  
Peter J. Maag  
Maag Law Firm, LLC  
22 West Lorena Avenue  
Wood River, IL 62095  
618-973-8679  
tmaag@maaglaw.com

#### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing was filed, using the CM/ECF system, which will send notification to all registered users:

Dated: 11-8-2024

S/Thomas G. Maag